

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOSE ATILANO, individually and on behalf  
of themselves and similarly situated  
Employees,

Plaintiffs,

V.

A SAFE HAVEN LLC and A SAFE HAVEN  
FOUNDATION,

Defendants.

Case No. 1:17-cv-00758

Judge John J. Tharp Jr.

Magistrate Judge Young B. Kim

**DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION  
FOR LEAVE TO FILE AMENDED COMPLAINT**

Defendants, A Safe Haven LLC and A Safe Haven Foundation, do not object to the filing of the proposed Second Amended Complaint; provided, however, that Defendants' lack of opposition and the Court's grant of Plaintiffs' motion does not waive or in any way prejudice any defense or argument that Defendants may have with respect to the claims asserted in the Second Amended Complaint, including, without limitation, the appropriateness of collective/class treatment of any claims in this lawsuit.

Dated: March 16, 2020

Respectfully submitted,

/s/ William J. Wortel

One of the Attorneys for Defendants

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**CERTIFICATE OF SERVICE**

I, William J. Wortel, an attorney, certify that I caused a copy of the foregoing *Defendants' Response to Plaintiffs' Motion for Leave to File Amended Complaint* to be served upon the following individuals via the Court's electronic filing system, on this March 16, 2020:

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/s/ William J. Wortel  
William J. Wortel